

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
C.A. NO. 5:13-cv-00084-BO

MARIAN S. GIBBONS,

Plaintiff,

vs.

GC SERVICES LLC, et al.

AFFIDAVIT OF PAUL GROVER

NOW COMES the affiant, Paul Grover, and after being duly sworn, does depose and says as follows:

1. I am Paul Grover and I am employed by the Defendant GC Services Limited Partnership as its Vice President, Client Management Group.

2. I am more than eighteen years of age and am otherwise competent to give the testimony contained herein.

3. I am familiar with GC Services Limited Partnership, its affiliates and their predecessors in interest (hereinafter referred to collectively as "GC Services").

4. GC Services Limited Partnership is a privately held limited partnership. GC Services Limited Partnership is authorized to transact business in North Carolina and holds a collection agency license issued by the North Carolina Department of Insurance.

5. GC Services Limited Partnership is a defendant in the above captioned action and also appears to have been misdesignated as GC Services LLC. GC Services Limited Partnership has previously been misdesignated in other litigation as GC Services LLC.

6. GC Services Limited Partnership is the sole member and manager of GC Services International LLC.

7. GC Services International LLC is a Delaware limited liability company.

8. GC Services Corp. is a defunct Delaware corporation. GC Services Limited Partnership is the successor in interest to GC Services Corp. which was administratively dissolved in 1986.

9. GC Services has never conducted business as GC Services LLC.

10. I am familiar with the books and records of the defendants GC Services International, LLC, GC Services Corp. and GC Services Limited Partnership as they pertain to the plaintiff.

11. GC Services International LLC and GC Services Corp. were never retained to collect a debt owed by the plaintiff and neither have attempted to communicate with plaintiff nor attempted to collect a debt from plaintiff. Neither GC Services International LLC nor GC Services Corp. have pulled or made an inquiry on plaintiff's credit report.

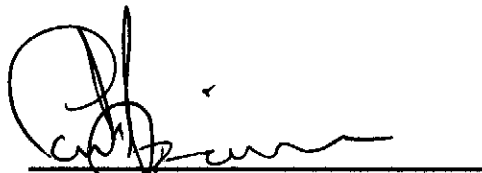
12. GC Services Limited Partnership, however, was retained by Chase Bank USA, N.A. on or about September 6, 2012 to collect a debt owed to it by the plaintiff.

13. Any collection efforts undertaken by GC Services regarding the Chase Bank USA account were undertaken by GC Services Limited Partnership.

14. GC Services Limited Partnership made telephone calls to the plaintiff in its attempt to collect a debt; however, GC Services Limited Partnership did not utilize an automated telephone dialing service, did not use an automated messaging system and placed each call manually.

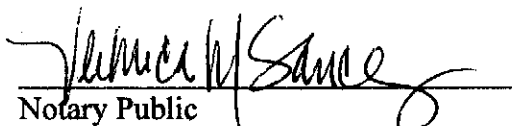
15. Further the affiant sayeth not.

This the 10th day of April, 2013.


Paul Grover

STATE OF TEXAS
COUNTY OF Harris

Sworn to and subscribed before me, this the 10th day of April, 2013.


Notary Public

My Commission Expires: 3/16/16



CERTIFICATE OF SERVICE

The undersigned hereby certifies that she served the foregoing document on the following
via first class mail, postage prepaid as follows:

Marian S. Gibbons
1414 Tumbling Stone Way
Garner NC 27529

GC Services LLC
Attn: John R. Hughes, Registered Agent
2884 Clifton Road
Columbus OH 43221

This the 15th day of April, 2013.

/s/ Caren D. Enloe

Caren D. Enloe

Of Morris, Manning & Martin, LLP

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*Counsel for Defendants GC Services Corp., GC
Services Limited Partnership, and GC Services
International LLC*